

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. No. 31880

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the FTX Recovery Trust², hereby certifies as follows to the best of my knowledge, information and belief:

1. On June 30, 2023, the joint liquidators of Three Arrows Capital, Ltd. (the “Joint Liquidators”) filed identical proofs of claim (the “Original Proofs of Claim”) on behalf of Three Arrows Capital, Ltd. (“3AC”) against FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”).

2. On July 8, 2024, the Debtors filed the *Debtors’ Objection to Proof of Claim Filed by the Joint Liquidators of Three Arrows Capital, Ltd.* [D.I. 19797], seeking an order disallowing and expunging the claims asserted in the Original Proofs of Claim.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established through the Debtors’ confirmed Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates (the “Plan”) [D.I. 26404], which became effective on January 3, 2025 [D.I. 29127]. Capitalized terms not defined herein shall have the means assigned to the Plan.

3. On November 6, 2024, the Joint Liquidators moved for leave to file an amended proof of claim (the “Motion for Leave”) [D.I. 27755], which the Debtors opposed [D.I. 28587].

4. On March 13, 2025, the Court granted the Motion for Leave [D.I. 29924].

5. On March 27, 2025, the Joint Liquidators submitted their amended proof of claim to the FTX Recovery Trust, which was assigned claim number 100078 and superseded claim number 5319 (the “Amended Proof of Claim”).

6. On June 20, 2025, the FTX Recovery Trust filed an Objection to the Amended Proof of Claim [D.I. 30932] (the “Objection”)³.

7. On July 24, 2025, the FTX Recovery Trust and the Joint Liquidators (collectively, the “Parties”) entered into a stipulation governing litigation of the Amended Proof of Claim [D.I. 31861], which the Court approved on July 25, 2025 [D.I. 31880].

8. The Parties have conferred in good faith and agreed to modify the schedule with respect to litigation of the Amended Proof of Claim, which is memorialized in the *Amended Stipulation Governing Litigation of the FTX Recovery Trust’s Objection to Amended Proof of Claim Filed by the Joint Liquidators of Three Arrows Capital, Ltd.* (the “Stipulation”). Attached hereto as **Exhibit A** is a proposed order (the “Proposed Order”) approving the Stipulation. Attached as **Exhibit 1** to the Proposed Order is the Stipulation, as agreed to by and among the Parties.

³ Capitalized terms not otherwise defined herein shall have the same meanings ascribed to them in the Stipulation or the Claim Objection, as applicable.

9. The Parties have no objection to entry of the Proposed Order. In accordance with the Court's electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

10. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Order at its earliest convenience.

Dated: September 12, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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